

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF
ILLINOIS EASTERN DIVISION**

Edwin Rios and Vivian Rios,)	
)	
Plaintiffs,)	
)	
vs.)	14 C 07030
)	
Jacqueline Herrerias; Say Beignet Café)	
& Wine Bar, LLC (an Illinois Limited)	District Judge Gary Feinerman
Liability Company) n/k/a Sage Kitchen)	
+ Bar LLC; Hems Group, LLC (an Illi-)	
nois Limited Liability Company);)	Magistrate Judge Mary Rowland
)	
Defendants.)	

PLAINTIFFS' MOTION FOR A DEFAULT JUDGMENT

Plaintiffs, Edwin Rios, Vivian Rios, and the Hems Group, by and through their attorney, Carlton Odum of Odum Law Offices, move pursuant to Rule 55(b) of the Federal Rules of Civil Procedure for a default judgment against Defendant Jacqueline Herrerias (“Herrerias”), Defendant Say Beignet Café & Wine Bar, LLC n/k/a Sage Kitchen + Bar LLC (“Say Beignet Café”), and Defendant Hems Group, LLC (“Hems Group LLC”) (together “Defendants”). In support of its Motion for a Rule 55(b) Default Judgment, Plaintiffs state as follows:

1. On July 22, 2015, the court entered a Fed. R. Civ. P. 55(a) default against Defendants Jacqueline Herrerias, Say Beignet Café & Wine Bar, LLC, and Hem Group, LLC. (Docket no. 46).
2. The Plaintiffs now seek a judgment of default against the Defendants pursuant to Fed. R. Civ. P. 55(b)(2).
3. In further support of this motion the plaintiff attaches the following:
 - a. Exhibit 1 - Complaint;

- b. Exhibit 2 - Declaration of Vivian Rios;
- c. Exhibit 3 - Declaration of Edwin Rios;
- d. Exhibit 4 - Proposed Judgment.

WHEREFORE, the Plaintiffs respectfully request that the court enter the proposed judgment attached to this motion as Exhibit 4 and grant the Plaintiffs such further and other and related relief as the court considers just.



Attorney for Plaintiffs

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PROOF OF SERVICE

I hereby certify that on this 14th day of August, 2015, the foregoing instrument was electronically filed with the U.S. District Court Clerk, Northern District of Illinois, Eastern Division, by using the CM/ECF system, and each of the defendants have been served via a notice of electronic filing by the CM/ECF system.



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